

REMARKS

Claims 1-19 are pending in the application and the same are rejected. Claims 1-19 remain in the application and are presented for review and further consideration by the Examiner.

The Examiner has rejected claims 1, 3-8, 10-13, and 15-19 under 35 U.S.C. §102(b) as being anticipated by Woodruff, et al., U.S. Patent No. 5,607,275. (Examiner's Action, page 2, ¶ 1).

Applicant respectfully disagrees.

Woodruff discloses a cartridge library having a drum-like member or hub 34, cartridge racks 60, and rack mounts 110. Each rack mount 110 includes a rack engagement mechanism 140 mounted to a plate 112. The Examiner considers the plates 112 to be part of the hub.

Considering the plates 112 to be a part of the hub 34 directly contradicts the teaching of Woodruff. Woodruff teaches that the drum-like member 34 is the hub and the rack mounts 110 are selectively attachable or securable to a peripheral face of the hub 34. (Woodruff, col. 5, lines 56-67).

Woodruff defines the hub as being octagonal in shape, having eight essentially planar peripheral faces. Eight spokes emanate from the center of the hub to the hub faces. (Woodruff, col. 4, lines 9-13). By the definition of the word "peripheral", the peripheral faces of the hub define the perimeter of the hub. The rack mounts are attachable to the hub, outside the perimeter of the hub. Therefore, according to the teaching of Woodruff, the rack mounts are intermediate parts between the cartridge racks and the hub and are not properly considered part of the hub. Since the plates are part of the rack mounts and the rack mounts are not properly considered part of the hub, neither are the plates properly considered part of the hub.

Woodruff further discloses each rack engagement mechanism 140 having an orientation slot 170 formed in its base plate 112. The cartridge racks 60 have an orientation fin 172 for insertably mating with the orientation slots 170 of the rack engagement mechanisms 140. The orientation fins 172 do not mate with

the hub 34. Since the plates 112 of Woodruff cannot be properly considered part of the hub 34, Woodruff does not disclose the cartridge racks 60 having a latch reciprocal configured to mate with the hub 34. Neither does Woodruff disclose any other structure having a latch reciprocal configured to mate with the hub 34.

In contrast, Applicant's independent claims 1, 8, and 13, include wording that there is at least one object within the rotatable carousel and each of the objects has a latch reciprocal configured to mate with the latching hub. Since Woodruff fails to disclose any structure having a latch reciprocal that mates with the hub 34, Woodruff does not disclose this limitation of Applicant's independent claims 1, 8, and 13.

Woodruff further discloses that the rack engagement mechanisms 140 are mounted onto hub 34 and cartridge racks 60 are attached to rack engagement mechanisms 140. Woodruff does not disclose that the cartridge racks 60 and their orientation fins 172 contact the hub 34. Since the plates 112 of Woodruff cannot be properly considered part of the hub 34, Woodruff does not disclose the rack engagement mechanisms 10 being configured to maintain contact between the orientation fins 172 and the hub 34. Neither does Woodruff disclose any other structure acting as a retainer configured to maintain contact between a latch reciprocal and the hub 34.

In contrast, Applicant's independent claims 1, 8, and 13, include wording that there is at least one retainer adjacent each object and each retainer is configured to maintain contact between one of the latch reciprocals and the latching hub. Since Woodruff fails to disclose any structure acting as a retainer configured to maintain contact between a latch reciprocal and the hub 34, Woodruff does not disclose this limitation of Applicant's independent claims 1, 8, and 13.

In summary, since the plates 112 of Woodruff cannot be properly considered part of the hub 34, Woodruff does not disclose either an object

having a latch reciprocal configured to mate with the hub or a retainer configured to maintain contact between the latch reciprocal and the hub.

The Examiner has rejected claims 2, 9, and 14 under 35 U.S.C. §103(a) as being unpatentable over Woodruff, et al., U.S. Patent No. 5,607,275, as applied to claims 1, 8 and 13, and further in view of Dodd, et al., U.S. Patent No. 3,809,263. (Examiner's Action, page 4, ¶ 1).

In view of Applicant's arguments with respect to independent claims 1, 8, and 13 being allowable, Applicant respectfully submits that the remaining dependent claims are also allowable because they contain all of the limitations of their respective independent claims and further add structural and functional limitations.

The foregoing arguments are believed to be a complete response to the most recent Examiner's Action.

No new matter has been added.

It is respectfully submitted that there is no claim, teaching, motivation, or suggestion in any of the prior art cited, alone or in combination, to produce what Applicant claims.

It is further submitted that the application defines patentable subject matter and that the claims are in a condition for allowance. Such allowance at an early date is respectfully requested.

Should any issues remain which would preclude the prompt disposition of this case, it is requested that the Examiner contact the undersigned practitioner by telephone.

Respectfully submitted,
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